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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ERICA BLUTH, an individual, and
LAVORIA WILSON, an individual,

Plaintiff,
vs.

TYLER BAEHR, and individual, and THE
CITY OF RENO, a political subdivision of
the State of Nevada,

Defendants.

CASE NO.: 3:25-cv-00129-ART-CSD

**OPPOSITION TO PLAINTIFFS'
MOTION FOR PROTECTIVE ORDER**

Defendant, the City of Reno ("the City"), by and through their attorneys, Reno City Attorney Karl S. Hall and Deputy City Attorney Peter Keegan, hereby submit the instant Opposition to Plaintiffs' Motion for Protective Order (ECF No. 11).

MEMORANDUM OF POINTS AND AUTHORITIES

I. The Plaintiffs' Instant Motion was Unnecessary.

The Plaintiffs' Motion for Protective Order (ECF No. 11) mischaracterizes the email communications between the parties and fails to attach the same.¹ In the April 14-22, 2025, email

¹ Attached here to as **Exhibit 1** are the April 14-22, 2025, email communications between the parties referenced in Plaintiff's Motion for Protective Order (ECF No. 11).

1 communications the City did not oppose a protective order but instead expressed that a stipulated
 2 protective order was premature until such time as the Court ruled on its Motion to Stay.² The City
 3 filed its Motion for Stay (ECF No. 22) on April 7, 2025. The City submits that its Motion to Stay
 4 raises meritorious concerns and was not part of a strategic maneuver to hinder Plaintiffs' ability to
 5 pursue their claims efficiently.

6 Plaintiffs' instant motion was also unnecessary for several procedural reasons. First, the
 7 City and the Plaintiffs completed initial disclosures with Plaintiffs having provided their First
 8 Supplemental Disclosures and the same expected shortly from the City. Second, no discovery has
 9 been propounded by any party. Third, no joint case management report or discovery plan and
 10 scheduling order has been filed because the parties stipulated to an extension, which the Court
 11 granted, to accommodate Defendant Baehr's non-appearance.³ Fourth, Defendant Baehr just
 12 recently filed his Answer to Complaint (ECF No. 20) on April 7, 2025, and had not yet participated
 13 in an early case conference.⁴ Fifth, the current deadline for the parties to file a joint case conference
 14 report is May 23, 2025, with a case management conference scheduled for May 28, 2025.⁵

15 For the foregoing reasons, Plaintiff's Motion for a Protective Order (ECF No. 11) was
 16 premature and unnecessary; therefore, the City respectfully requests that the Court deny the same.

17 DATED this 7th day of May 2025.

18 KARL S. HALL
 19 Reno City Attorney

20 By: /s/ Peter Keegan
 21 PETER K. KEEGAN
 22 Deputy City Attorney
 23 Nevada State Bar No. 12237
 24 Post Office Box 1900
 25 Reno, Nevada 89505
 26 *Attorneys for the City of Reno*

27 ² Exhibit 1 at 1.

28 ³ See Stipulation and Order to Extend Deadline for Joint Case Management Report and Reschedule Case Management Conference (ECF No. 13 at 2-3).

⁴ Answer to Complaint, filed April 7, 2025 (ECF No. 20).

⁵ (ECF No. 13 at 4).

CERTIFICATE OF SERVICE

Pursuant to FRCP 5(b), I certify that I am an employee of the RENO CITY ATTORNEY'S OFFICE, and that on this day, I served a copy of on the **OPPOSITION TO PLAINTIFFS' MOTION FOR PROTECTIVE ORDER** on the party(s) set forth below by:

_____ Placing an original or true copy thereof in a sealed envelope placed for collection and mailing in the United States Mail, at Reno, Nevada, postage prepaid, following ordinary business practices, and addressed as follows:

_____ Personal delivery.

 X CMECF electronic service.

_____ Federal Express or other overnight delivery.

_____ Reno/Carson Messenger Service.

addressed as follows:

Luke Busby, Esq.
316 California Ave.
Reno, NV 89509
Attorney for Plaintiffs

Lauren Gorman, Esq.
275 Hill Street, Ste 248
Reno, NV 89501
Attorney for Plaintiffs

Tyler Michael Baehr
9752 Pachuca Drive
Reno, NV 89521
In Propria Persona

DATED this 7th day of May 2025.

/s/ Terri Strickland
Terri Strickland
Legal Assistant

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List of Exhibits

Exhibit No.	Document	Page Nos.
1	April 14-22, 2025, Email Communications	9